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May 29, 2018

BY ECF

Hon. Katherine B. Forrest
United States District Judge
United States District Court
500 Pearl Street
New York NY 10007

Re: *United States v. Ross William Ulbricht, et al*, 14 Cr. 68 (KBF)
5/1/2018 Order Re Requests for Copies of Sealed Documents

Dear Judge Forrest:

I write on behalf of Defendant Ross Ulbricht in response to the court's order of May 1, 2018 (ECF #330), in which the Court ordered that Mr. Ulbricht be allowed "access" to certain sealed records.

1. The sealed records clerk advises that *access* does not mean copies, that counsel for Mr. Ulbricht can (travel from Denver and) view the records in the clerk's office but cannot obtain copies of the sealed documents to which he is now allowed *access*, without a court order that he be allowed to receive actual copies of the documents.

Viewing sealed documents in the clerk's office will not be useful to the research and motions preparation that Mr. Ulbricht intends to pursue in his efforts to obtain relief from his convictions and sentence. Mr. Ulbricht needs actual copies of the documents to work with.

Each of the sealed documents the court has now authorized Mr. Ulbricht to *access*, was supposedly provided to Mr. Ulbricht via his counsel during the trial phase of his case. Mr. Ulbricht would have those documents now if his trial counsel had either voluntarily or in response to a court order provided the complete client file to undersigned counsel.

There is no reason that Mr. Ulbricht should now be denied these documents that he needs to exercise his rights. I previously requested (ECF #329, 4/10/2018) and am now renewing my earlier request to receive *copies of each of the sealed documents (including #275, the DVD) identified in the 3/29/2018-dated email message from Mary Salcedo to Joseph Pecorino*.

Therefore, Mr. Ulbricht now requests an order from the Court authorizing the clerk to

provide to undersigned counsel copies of the actual documents listed in the May 1 Order.

2. Mr. Ulbricht also requests copies of each of the remaining requested documents on which the Court has not yet announced (see 5/1/2018 Order) whether he will be allowed copies.

Respectfully submitted,

/s/ Paul Grant

Paul Grant

Counsel for Ross William Ulbricht

cc: Eun Young Choi (by ECF)

Assistant United States Attorney